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April 13, 2005

Via Facsimile and First Class Mail

Kathleen J. Hill, Esq.
Law Office of Kathleen J. Hill
92 State Street, Suite 700
Boston, MA 02109

Re: Griffith v. OneBeacon Insurance Company, et. al.
U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Kathleen:

Enclosed please find a notice of Defendants' intent to continue the deposition of Bernadine Griffith on April 26 and 28, 2005.

Regarding your desire to make a personal recording of Ms. Griffith's deposition, in light of our conversation yesterday afternoon, I think we must simply agree to disagree. If you insist upon making a recording of the deposition, we will deal with that in due course.

After reflecting on our conversation regarding production of Ms. Griffith's medical and mental health records, I think it would be clearest if you could tell me which documents or types of documents you do not want produced so that I may request production of all the medical records with the exception of whatever specific documents you oppose. Defendants will agree to limit the production to the time period from 1994 to the present for the three providers Moner, Tramposch, and Garrison.

Please let me know whatever information/ language you want to exclude from production no later than April 18, 2005. I will then provide Attorney Perlo with the revised subpoenas so that he can produce the documents in advance of the depositions.

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Additionally, Dr. Helen Tramposch's deposition has been confirmed for May 13, 2005 to begin at 10:00 am at the Lahey Clinic in Burlington, Massachusetts.

Please let me know if you have any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Leah M. Moore', with a long horizontal flourish extending to the right.

Leah M. Moore

Enclosures

cc: Joan K. Geddes, Esq. (via first class mail)
Keith B. Muntyan, Esq. (w/o encls.)